

JAP:JAM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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15-158 M

UNITED STATES OF AMERICA

- against -

C O M P L A I N T

LUQUMAN ABODUNRIN,

(T. 18, U.S.C.,§1709)

M. No. _____

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JONATHAN JIMENEZ, being duly sworn, deposes and says that he is a Special Agent with the Office of the Inspector General for the United States Postal Service ('OIG'), duly appointed according to law and acting as such.

On or about and between February , both dates being approximate and inclusive, within the Eastern District of New York, the defendant LUQUMAN ABODUNRIN, being an employee of the United States Postal Service ('Postal Service'), did knowingly, intentionally and unlawfully embezzle, steal, abstract, and remove mail entrusted to her and which came into her possession intended to be conveyed by mail and carried and delivered by any carrier, messenger, agent or other person employed by the Postal Service.

(Title 18, United States Code, Section 1709)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about February 19, 2015 an OIG investigative analyst prepared 1 'test piece' of mail, one of which was addressed to 'Maria Slovkvicz' at 1742 East 2nd Street, Brooklyn, New York, 11223. The test piece was a parcel purportedly from eBay with an Apple iPhone inside.

2. On or about February 19, 2015, OIG agents at the Gravesend Post Office in Brooklyn, while working under my supervision, placed the test piece in the LUQUMAN ABODUNRIN's collection area before he arrived at the post office. When the LUQUMAN ABODUNRIN began work, other agents and I observed him scan the test piece 'undeliverable' and hide the test piece in a tub next to his sorting area. I and other agents subsequently observed LUQUMAN ABODUNRIN rip, remove, and abstract the contents from multiple additional pieces of U.S. mail.

3. On or about February 20, 2015, OIG agents at the Gravesend Post Office continued surveillance of LUQUMAN ABODUNRIN and observed him rip, remove, abstract the contents from multiple pieces of U.S. mail. OIG agents later observed the LUQUMAN ABODUNRIN take the aforementioned test piece from BPDC and place it in his personal vehicle.

4. The other agent and I then brought the defendant to an office in the Gravesend Post Office and advised him of his Miranda rights, which he indicated he understood and waived. The defendant then stated both verbally and in a written statement,

¹ Because the purpose of this complaint is to state only probable cause, I have not described all the relevant facts and circumstances of which I am aware.

in sum and substance and in part, that he had been opening mail for approximately the past two years and that he had removed the aforementioned test piece and placed it in his vehicle.

5. The defendant consented to a search of his vehicle, and the aforementioned test piece was recovered, along with various other pieces of U.S. mail.

WHEREFORE, your deponent respectfully requests that the defendant LUQUMAN ABODUNRIN be dealt with according to law.

S/ Jonathan Jimenez

Jonathan Jimenez
Special Agent
Office of the Inspector General for the Postal
Service

Sworn to before me this
20th day of February 2015

S/ Steven M Gold

THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK